

JOHN ASHCROFT
Governor



G. TRACY MEHAN III
Director

STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES

MEMORANDUM

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

DATE: June 20, 1989
TO: Mr. Art Groner, Chief, Enforcement Section, WMP
Mr. Keith Schardein, Chief, Superfund Section, WMP
FROM: *Jim Full*
Mr. Jim Full, Chief, Solid Waste Section, WMP
SUBJECT: Hydrogeologic Investigation, West Lake Sanitary Landfill,
Permit Number 118912, St. Louis County

File: West Lake
ID # MBDO7990932
Break: 17.8
Other: 6-20-89
clm

The Permits Unit of the Solid Waste Section has completed its review of the operator's January 4, 1988 (received January 5, 1988) response to the WMP's October 9, 1987 comment letter and offers the following draft comments for your review:

1. In comment #4 of Mr. Jon Kraft's October 9, 1987 letter he states "... groundwater may be migrating from the alluvial aquifer into the limestone, perhaps as a result of pumping in the quarry." It is unclear as to what pumping Mr. Kraft is referring to. Also, item #4 of Mr. Robbie Robinson's January 4, 1988 response references attached water level records. I was unable to locate these records in either the working file or the main file;
2. Item B, Short Term Monitoring, in Mr. Robinson's January 4, 1988 letter states, "The WMP has essentially recommended another sampling round for priority pollutants. This may be reasonable if we can agree on what WMP considers the worst leachate condition." It is unclear as to what is expected or required concerning the relation between short term priority pollutant monitoring and the "worst leachate condition." Mr. Bill Weis did not address this question in his February 17, 1988 memo concerning his review of Mr. Robinson's letter;
3. Items B and C indicate that West Lake does not intend to perform either short or long term radiation monitoring and suggest that the WMP request the U.S. Department of Energy perform radiation sampling. In Mr. Weis' February 17, 1988 memo he indicates that the Superfund Section is willing to contact U.S. D.O.E. regarding this, however, if U.S. D.O.E. refuses we should require West Lake to perform radiation monitoring. There is no record of the Superfund Section having contacted the U.S. D.O.E.; and

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SUPERFUND RECORDS

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4. Item C.1, Long Term Monitoring, of Mr. Robinson's letter states that quarterly priority pollutant monitoring is unreasonable. Mr. Weis' February 17, 1988 memo agrees that longer sampling intervals are acceptable and that a decision on long term monitoring requirements may be delayed until the short term monitoring is completed.

In summary, it appears that the main unanswered questions regarding short term monitoring concern priority pollutant and radiation monitoring. When the Superfund and Enforcement Sections complete their reviews, the Solid Waste Section suggests that we meet to discuss an appropriate response.

JH:mpl